

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA

v.

SHAN MEHMOOD,

Defendant.

No. 1:23-MJ-284

**AFFIDAVIT IN SUPPORT OF A
CRIMINAL COMPLAINT AND ARREST WARRANT**

I, Paul J. West, being duly sworn, depose and state the following:

INTRODUCTION

1. This affidavit is submitted in support of a criminal complaint and arrest warrant charging SHAN MEHMMOD with having knowingly and intentionally possessed with the intent to distribute a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1) and (b)(1)(C).

2. I have been employed as a Special Agent with the FBI since January of 2008. I am currently assigned to the FBI's Washington Field Office (WFO). Since October of 2008, I have worked on federal narcotics investigations and have participated in several investigations which have led to the arrest and conviction of narcotics traffickers. Since 2008, I have also received training in the investigation of narcotics offenses and various other crimes. During the course of my training and experience, I have become familiar with the methods and techniques associated with the importation and distribution of narcotics, the laundering of drug proceeds, and the organization of drug conspiracies. In the course of conducting narcotics investigations, I

have used the following investigative techniques: interviewing informants and cooperating witnesses; conducting physical surveillance; supporting undercover operations; consensual monitoring and recordings of both telephonic and non-telephonic communications; analyzing telephone pen registers and caller identification system data; conducting court-authorized electronic surveillance; and preparing and executing search warrants that have led to substantial seizures of narcotics, firearms, and other contraband.

3. This affidavit is based upon my own knowledge of the investigation of SHAN MEHMMOD and other related investigations, information provided to me by other agents of the FBI, law enforcement officials from various other agencies, including the Arlington County Police Department (ACPD), the Montgomery County Police Department (MCPD), the Drug Enforcement Agency (DEA), the Alcohol, Tobacco, and Firearms (ATF), my review of documents and information to include official government information, physical surveillance, and other information gathered during this investigation. Because this affidavit is being submitted for the limited purpose of enabling this Court to make a judicial determination of probable cause to issue an arrest warrant, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish the legal basis for the issuance of an arrest warrant.

4. Based on the facts set forth in this affidavit, I believe there is probable cause to believe that on or about April 27, 2023, in Arlington County, Virginia, in the Eastern District of Virginia, SHAN MEHMOOD knowingly and intentionally possessed with the intent to distribute a mixture and substance containing a detectable amount of fentanyl, a Schedule I controlled substance, in violation of 21 U.S.C. § 841(a)(1), as well as other federal criminal statutes not specifically charged in this complaint.

FACTS SUPPORTING PROBABLE CAUSE

5. On March 7, 2023, at approximately 6:45 p.m., the ACPD responded to a suspected drug overdose at 1233 N. Scott Street, in Arlington County, Virginia. At the location, ACPD found the victim, Louis Flores-Cooper, unconscious and in cardiac arrest, in a stairwell. Lying next to Flores-Cooper was a rolled-up piece of US Currency with burn residue and a piece of burnt foil, which was folded around a partially burnt blue pill, consistent with those known to contain fentanyl. The ACPD also located on or about the person of Flores-Cooper a cellular telephone. Flores-Cooper was transported to Virginia Hospital Center for treatment, and he was later be pronounced dead on March 8, 2023. While at the hospital, a blue pill imprinted with “M30” was located in the pocket of Flores-Cooper and seized by the ACPD. This pill was submitted to the Northern Laboratory for the Commonwealth of Virginia for analysis, and it was determined that the pill contained fentanyl.

6. The autopsy report from the Office of the Chief Medical Examiner for the Commonwealth of Virginia indicated the cause of death for Flores-Cooper was “acute fentanyl intoxication,” and the manner of his death was listed as “accident.”

7. The ACPD interviewed family members of Flores-Cooper, and during these conversations, law enforcement learned that Flores-Cooper was known to communicate with drug distributors utilizing his cellular telephone and social media, specifically Instagram. The family provided Flores-Cooper’s Instagram username of “longwaylouie” (<https://www.instagram.com/longwaylouie/>).

8. The ACPD searched the cellular telephone of Flores-Cooper pursuant to a warrant and located a conversation on the device between Flores-Cooper’s Instagram Account and the Instagram Account with the display name of “s#@n.” The ACPD investigation further revealed

that the Instagram account with the display name “s#@n” had an associated Instagram ID of 649864456 and Username of “flylikeiconic.” The following is a conversation between Flores-Cooper and the user of the Instagram account “flylikeiconic” on March 7, 2023, the day Flores-Cooper overdosed on fentanyl:

Sender	Time	Content
flylikeiconic	11:55:33 AM	how many u want
flylikeiconic	12:00:04 PM	get 4 for 30
flylikeiconic	12:00:17 PM	i a pull up real soon
Flores-Cooper	12:27:57 PM	Fwm for 25
flylikeiconic	12:43:18 PM	lol not 4 for 25 brodie i’m pulling up too
flylikeiconic	12:44:00 PM	i told u bra up the ticket?
Flores-Cooper	12:51:29 PM	Damn I got you
Flores-Cooper	12:51:33 PM	What time you comin
flylikeiconic	12:51:41 PM	be there in 25
flylikeiconic	12:51:46 PM	how many
Flores-Cooper	12:53:35 PM	I guess the 4
flylikeiconic	12:57:13 PM	ok bet brova
flylikeiconic	12:57:17 PM	lyk when i’m out there
Flores-Cooper	1:03:24 PM	Ight I jus got on lunch hmp
flylikeiconic	1:04:54 PM	coming 7 min
flylikeiconic	1:09:08 PM	1 min

flylikeiconic	1:09:14 PM	come to optical exit
Flores-Cooper	1:10:12 PM	Oh shit I was walking to Mickey D
Flores-Cooper	1:10:23 PM	I'm coming
Flores-Cooper	1:10:29 PM	I'm by chik fil a

9. The ACPD conducted a search for the account “flylikeiconic.” The search revealed the following URL: <https://www.instagram.com/flylikeiconic/>. The Username displayed on the profile page was “flylikeiconic,” and the Name displayed was “s#@n.” In addition, the profile included a photo of a person, to include his face and vehicle. Based on information depicted in the photo, the ACPD was able to identify the person in the photo as SHAN MEHMOOD.

10. The above conversation is indicative of individuals engaged in a narcotics transaction, specifically, in this case, blue fentanyl pills for the following reasons. MEHMOOD asked “how many u want” “get 4 for 30”, in reference to four pills for \$30, which is \$7.50 per pill. This price per pill is consistent with smaller-scale established customers. Flores-Cooper responded back “Fwm for 25,” which means that Flores-Cooper was asking MEHMOOD if he would sell the four pills for \$25, to which MEHMOOD responded “lol not 4 for 25 brodie i'm pulling up too” “i told u bra up the ticket?” In these responses, MEHMOOD explained to Flores-Cooper that he would not sell four pills at a price of \$25 unless he increased the quantity being purchased when he said “...up the ticket?” It is a common practice for drug dealers to give customers a price break on the total cost per pill being sold if the customer purchases a larger quantity of pills. In the remainder of the conversation, Flores-Cooper agreed to purchase four pills for \$30 from MEHMOOD while Flores-Cooper was on his lunch break in area that had an

optical center, McDonalds, and Chic-fil-A. The ACPD confirmed that Flores-Cooper was employed at a Target department store located at 6100 Arlington Blvd, Falls Church, Virginia, and that this Target had an optical department and is also located close to a McDonalds and a Chic-fil-A, all three of the locations mentioned in their conversation, above. Based on my training and experience, this conversation is consistent with the sale and purchase of blue M30 pills similar to those recovered during the course of the ACPD investigation. Furthermore, based on my training and experience I am familiar with these blue M30 pills, which are made to look like prescription oxycodone pills and which typically contain fentanyl.

11. The ACPD investigation determined that MEHMOOD was associated with telephone number 703-400-5389 (hereinafter referred to as the MEHMOOD PHONE), and the MEHMOOD PHONE was associated with a CashApp account with the username “To-Your-Door.” The ACPD obtained records from CashApp pursuant to legal process and confirmed MEHMOOD as the user of this account, the number for the MEHMOOD PHONE, and \$Cashtag of “\$limepup.” Furthermore, ACPD discovered in the CashApp return a transaction between Flores-Cooper and MEHMOOD, which occurred on March 7, 2023, at 1:11:08 PM, which is immediately following the last communication between Flores-Cooper and MEHMOOD at 1:10:29 PM, when they agreed to meet for the purchase of four pills for \$30. As referenced above, the ACPD recovered a burnt blue pill at the scene of Flores-Cooper’s overdose and a second blue pill that tested positive for fentanyl from the pocket of Flores-Cooper approximately five and a half hours after this conversation.

12. On April 27, 2023, the ACPD executed a search warrant at the residence of MEHMOOD, where he lived with his mother. Both MEHMOOD and his mother were present at the residence, and MEHMOOD was taken into custody without incident by ACPD. The ACPD

seized several items during the search warrant. The following is a list of some of the items seized, but is not a comprehensive list of all of the items seized from the residence:

- a. A clear plastic bag with a large number of blue M30 pills (see Figure 1)
- b. Taurus 9mm Handgun
- c. Digital Scales
- d. Approximately \$3,846 in US Currency
- e. CashApp card with a CashApp \$Cashtag: \$limepup



Figure 1: Pills Seized During Search Warrant of MEHMOOD's Residence

13. The ACPD submitted the pills seized during the search warrant executed at MEHMOOD's residence to the Northern Laboratory for the Commonwealth of Virginia to be analyzed. A number of the pills were found to contain fentanyl, and the lab indicated in the report there were 359 blue round tablets and two similar tablet fragments in the plastic bag. The

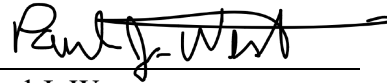
report only reported the quantity of pills and not the total weight; however, based my training and experience, the blue M30 pills typically weigh about 0.1 gram per pill.

14. During the course of the ACPD investigation, a search warrant was executed to obtain the content of MEHMOOD's Instagram Account "flylikeiconic." A review of this content confirmed the account was registered to the MEHMOOD PHONE, and revealed several Instagram Accounts that MEHMOOD communicated with in a manner consistent with drug trafficking, based on my training and experience. The records from Instagram further confirm the account is associated with the MEHMOOD PHONE. Your affiant has also reviewed records obtained by the ACPD pursuant to legal process, confirming the CashApp account "To-Your-Door" was associated with SHAN MEHMOOD and listed the same date of birth and address as listed on the Virginia driver's license for MEHMOOD and the MEHMOOD PHONE.

CONCLUSION

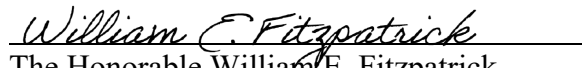
15. Based on the facts set forth above, I respectfully submit that there is probable cause to believe that on or about April 27, 2023, in Arlington County, Virginia, in the Eastern District of Virginia, SHAN MEHMOOD did knowingly and intentionally possess with intent to distribute a mixture and substance containing a detectable amount of fentanyl, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 21 U.S.C. § 841(a)(1) and (b)(1)(C).

Respectfully submitted,



Paul J. West
Special Agent
Federal Bureau of Investigation

Subscribed and sworn to in accordance with Fed. R. Crim. P.
4.1 by telephone on the 8th day of December, 2023.


The Honorable William E. Fitzpatrick
United States Magistrate Judge